



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

MAR 27 1996

B. Keith Hill, Treasurer
Senate Victory Fund PAC (FKA
Cochran Committee)
P.O. Box 1331
Jackson, MS 39225

Identification Number: C00202861

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s).

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the contributor. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Page: 7 of 10
For Line: 110

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Nine-Bak Farmers Cooperative PAC 7525 Red River Road Mehpeton, ND 58075 9698 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/29/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Mississippi Power Company Federal PAC Post Office Box 4079 Gulfport, MS 39501 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 10/27/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Mobil Corporation PAC 3225 Ballou Road Fairfax, VA 22037 0001 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 12/27/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Mutual of Omaha Companies PAC Mutual of Omaha Plaza Omaha, NE 68175 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 10/11/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
MAIDS PAC 415 North Lee Street Alexandria, VA 22314 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/29/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
National League of Postwomen PAC 1023 North Royal Street Alexandria, VA 22314 1569 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 12/12/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
National Brother Council PAC 1155 Fifteenth Street, NW Suite 414 Washington, DC 20005 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/29/95 AGGREGATE YEAR-TO-DATE: 2,000.00	2,000.00

SUBTOTAL of Receipts This Page 8,000.00

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 10
For Lines 11C

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
American Maritime Officers PAC 650 Fourth Avenue Brooklyn, NY 11232 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/29/95 AGGREGATE YEAR-TO-DATE: 2,000.00	2,000.00
American Physical Therapy Cong. Act. Comm. 1111 North Fairfax Street Alexandria, VA 22314 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/14/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
ATLA PAC 1050 - 3rd Street, NW Washington, DC 20007 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 8/29/95 AGGREGATE YEAR-TO-DATE: 5,000.00	5,000.00
Auction Markets PAC/Chicago Board of Trade 141 West Jackson Boulevard Chicago, IL 60604 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 11/22/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Barnett People for Better Government 90 W. Laura Street Jacksonville, FL 32202 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 9/29/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Bell South Services Federal PAC 181, 3700 Colonnade Parkway Birmingham, AL 35243 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 11/16/95 AGGREGATE YEAR-TO-DATE: 3,000.00	3,000.00
Better Government Fund of McDermott 1525 Wilson Boulevard Suite 100 Arlington, VA 22209 RECEIPT FOR: Primary	N/A OCCUPATION: N/A DATE: 12/12/95 AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00

SUBTOTAL of Receipts This Page 14,000.00

996600330022750387405

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page: 1 of 1
For Line: 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE:	AMOUNT OF DISBURSEMENT:
Bob Dale for President 810 First Street, N.E. Suite 300 Washington, DC 20002	Campaign contribution DISBURSEMENT FOR: Primary	9/29/95	4,000.00
JE Gordon Smith for U. S. Senate 5285 SW Meadows Road Suite 181 Lake Oswego, OR 97035	PURPOSE OF DISBURSEMENT: Contrib - Primary Debt Ret. DISBURSEMENT FOR: Primary	12/15/95	1,000.00
JE Gordon Smith for U. S. Senate 5285 SW Meadows Road Suite 181 Lake Oswego, OR 97035	PURPOSE OF DISBURSEMENT: Contrib - General DISBURSEMENT FOR: Primary	12/15/95	5,000.00
Reelect Thurmond Committee Post Office Box 11671 Columbia, SC 29211 5691	PURPOSE OF DISBURSEMENT: Campaign Contrib. - Primary DISBURSEMENT FOR: Primary	12/26/95	5,000.00
SUBTOTAL of Receipts This Page			15,000.00
TOTAL This Period			15,000.00

9936 003300 33 75 06 87 4 18

9 6 0 3 0 3 7 0 8 5 2